

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

GinA

Plaintiff

v

DAVID BRENNAN

Defendant

CIVIL NO. 1:16-cv-00095-NT

1:16-cv-00100-NT

L.C. CASES **KEN-CV-15-58**

KEN-RE-15-68

NOTICE OF REMOVAL OF ACTION

Violations of 1st, 4th, 7th, 10th and 14th Amendments

28 USC § 144 (Bias, Prejudice), § 455 (Disqualification of Judge),

28 USC § 1331 (Federal Question), § 1443 (Civil Rights Cases)

28 USC § 1631 (Transfer to Cure Want for Jurisdiction)

NOW COMES GinA, named as Plaintiff in the above-referenced state civil actions which GinA filed against David Brennan as a result of David Brennan's breach of contract, refusal to transfer legal title to the property and certain other discriminatory criminal actions in conspiracy with *Leigh Saufley et al, 1:16-cv-00095-NT* and *City of Augusta et al, 1:16-cv-00100-NT*, files this Notice of Removal pursuant to the 1st, 4th, 7th, 10th and 14th Amendments as well as 28 USC §§ 144, 455, 1331, 1443 and 1631, stating the following grounds for removal:

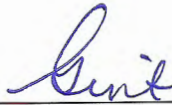
1. GinA lives at 2528 West River Road, Town of Sidney, County of Kennebec.
2. David Brennan's legal residence is 1233 S Atlantic Avenue #425, Daytona Beach, Volusia County, Florida and his summer address is 33 North Campers Point Road, Town of Readfield, County of Kennebec, Maine.
3. David Brennan sold 2528 West River Road to GinA in November 2014.
4. David Brennan refuses to transfer proper legal title to GinA.
5. David Brennan filed WATDC-SA-15-271 with absolutely no legal standing.

6. David Brennan testified under oath on the record during WATDC-SA-15-271 that GinA purchased the property in November 2014.
7. David Brennan testified that GinA never rented the property.
8. David Brennan testified that GinA never agreed to rent the property.
9. David Brennan testified that GinA never paid any rent for the property.
10. David Brennan has no legal standing to bring an eviction action against GinA.
11. Valerie Stanfill ordered judgment of forcible entry and detainer after hearing David Brennan repeatedly swear that GinA bought the property in 2014.
12. GinA performed in good faith from the beginning under terms of the contract by investing thousands of dollars and hundreds of hours of time fixing and maintaining the property.
13. GinA's investments have directly improved the property's value.
14. GinA claims title to the property by possession and improvement as secured by two mechanic's liens against the property for \$10,000 each recorded in April and August 2015.
15. GinA claims title to the property under legal doctrines of *quantum meruit*.
16. David Brennan refuses to transfer proper legal title to GinA.
17. Leigh Saufley et al presided over these lower state cases when they knew they were acting with a complete absence of all jurisdiction *ab initio* due to their conspiracy to illegally evict GinA in August and September 2014 from 32 Court Street so Maine Judicial Branch could purchase and destroy 32 Court Street to build a courthouse parking lot for the Capital Judicial Center, as described in AUGDC-SA-14-453, AP-14-56, KEN-14-410, KEN-CV-14-176, 1:15-cv-00031-NT, 1:16-cv-00095-NT and 1:16-cv-00100-NT.
18. Leigh Saufley et al have scheduled KEN-CV-15-58 and KEN-RE-15-68 for a hearing on April 28, 2016 in Kennebec County Superior Court despite fully knowing the court is now and would be acting with a complete absence of all jurisdiction.
19. This action is being removed pursuant to 28 U.S.C. §1446.

20. A copy of this Notice of Removal is being served upon David Brennan and his attorney and a copy has been filed with Kennebec County Superior Court.

WHEREFORE, GinA demands removal of these cases to this federal court and demands an entry of default in GinA's favor for both of these lower state court actions with all proper sanctions against David Brennan and Tavis Hasenfus, Esq. for abuse of the judicial system, or a trial by jury in federal district court in all matters so triable by a jury as GinA has expressly demanded under 1st, 7th, 10th and 14th Amendments.

DATED this 27th day of April, 2016.

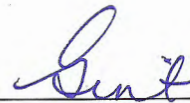


GinA
2528 West River Road
Sidney, Maine 04330
207-209-1767
gina.ecf@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Notice of Removal has been served on this day by first class mail to Tavis Hasenfus, Esq, at Levey, Wagley & Putnam, P.A., 161 Maine Street, P.O. Box 7, Winthrop, Maine 04365, attorney for David Brennan.

DATED this 27th day of April, 2016.



GinA